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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION	§	CASE NO. 21-30085-hdh11
OF AMERICA and SEA GIRT LLC,	§	
	§	
DEBTORS¹	§	Jointly Administered

**AMENDED AGENDA OF MATTERS SCHEDULED FOR HEARING ON
FEBRUARY 10, 2021 AT 2:00 P.M. (CT)**

UNCONTESTED MATTERS:

1. Debtors' Emergency Motion for Entry of an Order Extending the Time to File Schedules and Statements [Docket No. 4]

Responses/Related Documents: Interim Order Extending the Time to File Schedules and Statements [Docket No. 50]

Status: This matter is going forward on a final basis.

2. Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms [Docket No. 5]

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

Responses/Related Documents: Interim Order Authorizing the Debtors to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Business Forms [Docket No. 52]

Comments: In consultation with the recently formed Official Committee of Unsecured Creditors (the “UCC”), the Debtors have agreed to continue the hearing on this motion to a later date provided that the Court grant a corresponding extension of the deadline in paragraph 10 of the interim order for compliance with Section 345(b) with respect to the Debtors’ investment accounts at Morgan Stanley, which are currently the subject of a pending motion for relief from the requirements of Section 345(b). *See* Docket No. 78. The Debtors believe that the UCC consents to and supports the requested extension.

Status: This matter is going forward solely to request an extension of the interim relief from compliance with Section 345(b) with respect to the Debtors’ investment accounts at Morgan Stanley.

3. Debtors’ Emergency Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes [Docket No. 7].

Responses/Related Documents: Interim Order Authorizing The Debtors To Pay Certain Pre-Petition Taxes [Docket No. 51]

Status: This matter is going forward on a final basis.

4. Debtors’ Emergency Motion For Interim And Final Orders (I) Prohibiting Utilities From Altering, Refusing Or Discontinuing Services On Account Of Prepetition Invoices, (II) Approving Procedures For Providing Adequate Assurance Of Postpetition Payments, And (III) Approving Debtor’s Proposed Form Of Adequate Assurance [Docket No. 8]

Responses/Related Documents: Exhibit B [Docket No. 19]

Comments: Although this motion requests interim and final relief, it was not heard at the first day hearing in this case. In the time since filing this motion, the Debtors have communicated with their utility service providers, arranged to make the adequate assurance deposits proposed in the motion, and resolved any requests for additional or alternative adequate assurance by agreement. Accordingly, the Debtors propose that this matter go forward on a final basis.

Status: This matter is going forward.

5. Debtors’ Motion for Approval of Certain Notice and Confidentiality Procedures [Docket No. 77]

Responses/Related Document: None.

Status: This matter is going forward.

6. Emergency Joint Motion to Approve Agreement Providing Replacement Liens as Adequate Protection of Security Interest In Personal Property [Docket No. 106]

Responses/Related Document: None.

Status: This matter is going forward.

MATTERS NOT GOING FORWARD:

1. Debtors' Emergency Motion for Interim and Final Orders Authorizing Payment of Prepetition Employee Wages, Compensation, and Employee Benefits and Granting Related Relief [Docket No. 6]

Responses/Related Documents: Interim Order Authorizing The Debtors To Pay Pre-Petition Employee Wages, Compensation, And Employee Benefits And Granting Related Relief [Docket No. 41]

Comments: In consultation with the recently formed UCC, the Debtors have agreed to continue the hearing on this motion to a later date.

Status: This matter is not going forward.

2. Debtors' Motion for Waiver of the Requirements of Section 345(b) [Docket No. 78]

Responses/Related Documents: None.

Comments: In consultation with the recently formed UCC, the Debtors have agreed to continue the hearing on this motion to a later date.

Status: This matter is not going forward.

3. Debtors' Motion for Authority to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs [Docket No. 76]

Responses/Related Document: None.

Comments: In consultation with the recently formed UCC, the Debtors have agreed to continue the hearing on this motion to a later date

Status: This matter is going forward.

Dated: February 9, 2021
Dallas, Texas

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of February 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ John D. Gaither

John D. Gaither